

Illinois Bell Telephone Company,

Complainant,

Y.

Docket No. 01-0078

Commonwealth Edison Company,

Respondent.

Complaint regarding wrongful refusal to Provide customer-specific customer transition Charges.

REBUTTAL TESTIMONY OF PAUL D. STACK

ON BEHALF OF ILLINOIS BELL TELEPHONE COMPANY

Ameritech Illinois Ex. 2.0

April 29, 2002

OFFICIAL FILE
I.C.C. DOCKET NO. 01-0078
Ameritech Exhibit No. 2.0
Witness Stack
Date 5/10/07 Reporter ck

1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. Paul D. Stack. 507 E Michigan St., Mail Station M-14, Milwaukee, Wisconsin
5 53201.

6

7 **Q. By whom are you employed and in what capacity?**

8 A. I am employed by Johnson Controls, Inc. as Business Development Manager and
9 am responsible for consulting with customers on energy supply opportunities and
10 delivering strategic energy consulting for corporate clients. For further
11 information, a professional experience resume is attached to my testimony as
12 Exhibit 2.1.

13

14 **Q. What is your role in the relationship between Johnson Controls, Inc. ("JCI")**
15 **and Ameritech Illinois?**

16

17 A. As John Ragland explained in his direct testimony, JCI provides energy
18 management services to Ameritech Illinois through an "Energy Manager." I have
19 served as the Ameritech Illinois' "Energy Manager" from April, 2001, to the
20 present, succeeding John Ragland in that position.

21

22 **Q. Have you previously testified before this Commission?**

23 A. No.

24

25 **Q. What is the purpose of your testimony in this proceeding?**

26 A. The purpose of my testimony is to explain the original source of the list of
27 Ameritech Illinois facilities that was attached to Mr. Ragland's direct testimony.

28

29 **II. THE LIST OF FACILITIES**

30 **Q. Did you ever ask Commonwealth Edison Company for a list of facilities?**

31

32 A. To the best of my recollection, in May 2001, I contacted Del Hudson by phone
33 and requested a current list of the Ameritech Illinois facilities that were served
34 pursuant to the Ameritech Illinois Electric Service Contract (the "Agreement")
35 entered into between Ameritech Illinois and Commonwealth Edison Company
36 ("ComEd") and dated July 16, 1997. It is my understanding that Mr. Hudson is
37 the Senior Account Manager at ComEd for the Ameritech Illinois accounts, and
38 he has been my exclusive contact at ComEd for addressing questions that have
39 arisen regarding the Agreement or ComEd's service.

40

41 **Q. How did Mr. Hudson respond to your request?**

42

43 A. To the best of my recollection, he indicated he could obtain the list of facilities
44 under the Agreement. Shortly thereafter, Mr. Hudson sent me an e-mail message
45 to which the list was an attachment. The properties of the file indicate that the file
46 was created on Friday, 16 May 2001.

47

48 **Q. How many Ameritech Illinois facilities were included on the list?**

49 A. 136.

50

51 **Q. Do you have any reason to believe that the list Mr. Hudson provided was**
52 **something other than the list of facilities ComEd was serving under the**
53 **Agreement?**

54

55 A. No. To the best of my recollection, Mr. Hudson understood my request and
56 responded with the information available to him.

57

58 **Q. Does this conclude your testimony?**

59 A. Yes.

60

61

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Over a decade of knowledge and leadership in the energy industry in applications covering demand side engineering services, building controls technologies and applications, equipment commissioning, and energy commodity and capacity.

Professional History

Johnson Controls, Incorporated
Utility Services Group
Milwaukee, Wisconsin
Business Development Manager
November, 1997, through Present

Pivotal sales/marketing/product development position in product development profit center within Johnson Controls, Incorporated. Responsibilities included the following:

- ❖ Marketing, sale and delivery of the first projects bundling the Utility Services offerings,
- *Energy Supply Cost Management Services* and
- *Energy System Management Technologies.*
- ❖ Establishment of Energy Supply Cost Management as a measure in the service contracting business line at Johnson Controls, Inc.
- ❖ Development of the initial and ongoing marketing material, including sales brochures, marketing, sales, and delivery guidebooks, and sites on the Johnson Controls intranet and World Wide Web.
- ❖ Deployment of the Utility Services offering to the Johnson Controls, Inc., branch organizations, including introduction, positioning, training, and initial customer presentations, proposals, and closed contracts.
- ❖ Management of various vertical market and acquisition channels for the deployment, sale and installation of the Group's service and product offerings. Vertical markets include Government Systems Group and Global Accounts Group.
- ❖ Direct project management of the Group's largest service contract for energy supply, SBC - Ameritech.

Results:

- ❖ Sold and/or delivered the majority of all projects under contract by the Utility Services Group with minimum gross margin of 41%.
- ❖ Established levels of business in Johnson Controls branch office sufficient for the addition of a dedicated project manager.
- ❖ Key account successes included Southwestern Bell/Ameritech, Rockefeller Center, Calgary Public Schools, and West Group Publishing.
- ❖ Key Employee Contribution Award, Fiscal Year 2001

**WICOR, Incorporated
WICOR Energy
Milwaukee, Wisconsin
Key Account Manager
August 1995 through November 1997**

- ❖ Development and implementation of short- and long- term business plans for the establishment of WICOR Energy as a non-regulated affiliate of Wisconsin Gas Company.
- ❖ Front line sales and marketing of WICOR Energy consumer services including natural gas procurement, commodity, interstate pipeline capacity, balancing, and distribution.
- ❖ Analysis and review of natural gas supply/supplier options
- ❖ Daily and monthly account management including estimation of process and heating load profiles for minimization of balancing costs
- ❖ Design and implementation of special supply services to compete in burgeoning utility "supplier choice" territories.
- ❖ Development of performance measures for special supply service functions
- ❖ Sole publisher and editor of WICOR Energy Update, a monthly publication detailing developments in commodity and capacity markets throughout the country.
- ❖ Distinguished as top performer for two (2) consecutive reporting periods.

**WICOR, Incorporated
WISCONSIN GAS COMPANY
Milwaukee, Wisconsin
Industrial Account Executive
March 1990 through August 1995**

- ❖ Direct marketing and support activity of Wisconsin Gas Company's alternative pricing, procurement and delivery services for industrial end users.
- ❖ Technical and financial qualification of new and retrofit equipment installations with emphasis on natural gas technologies and applications.
- ❖ Technical and financial qualification and analysis of energy conservation projects.
- ❖ Technical and financial analysis of installation of back-up fuel system installations
- ❖ Interpretation and presentation of federal, state and local regulatory impacts for industrial end users.
- ❖ Design and permitting of natural gas distribution facilities.

The ANCO Consulting Group, Inc.
Milwaukee, Wisconsin
Energy Management Engineer
October 1998 through March 1990

Organization and direct marketing of the Smart Money Energy Program for Wisconsin Electric Power Company in the Kenosha, Wisconsin, area. Coordination of energy conservation projects from the perspective of the customer, contractor, and electric utility.

- ❖ Increase of 100% in electric demand reduction during the first quarter of 1989 over the last quarter of 1988
- ❖ Attainment of electric demand reduction goals for the entire 1989 reporting period within the second quarter of the 1989 reporting period
- ❖ Various citation for performance and excellence.

Project Engineer
December 1987 through October 1988

- ❖ On-site energy data collection and organization
- ❖ Technical and financial analysis of energy conservation projects for industrial segment of Wisconsin Electric Power Company
- ❖ Composition and presentation of energy analysis reports
- ❖ Investigation of energy conservation and application technologies
- ❖ Compilation, composition, and presentation of program justification reports for state regulatory bodies.
- ❖ Organization and facilitation of marketing of engineering and energy services

Stack Brothers, Incorporated
Superior, Wisconsin
Engineering Consultant
November 1988 through June 1992

Non-commissioned consultant to general manager of family-owned mechanical contracting business on issues including:

- ❖ Equipment sizing
- ❖ Installation of propane-air back-up systems
- ❖ Marketing and sales of contracting/engineering services
- ❖ Managerial and administrative functions

TSP One, Incorporated
Minneapolis, Minnesota
Engineering Intern
June 1987 through September 1987

Assistant to engineering staff in the design and layout of plumbing, hvac, power, and lighting plans for new and retrofit construction, coordination of the implementation, debugging, and utilization of equipment-sizing software, redesign of spreadsheet for estimation of conduction heat loss in buildings.

Formal Education

**University of Wisconsin
Madison, Wisconsin
Fall 1991 through Fall 1992**

- ❖ Pre-requisites to Master in Business Administration
- ❖ Energy industry coursework

**University of Wisconsin
Platteville, Wisconsin
Fall 1985 through Fall 1987**

Bachelor of Science: Mechanical Engineering

- ❖ Design and analysis of dynamical systems, i.e., vibratory response minimization.
- ❖ Design and analysis of internal combustion engines
- ❖ Computer applications: Drafting, design, and engineering
- ❖ Student Senate: College of Engineering
- ❖ Special Assignment Reporter: GEODE, College of Engineering Periodical
- ❖ Senior Design Project:
- ❖ Computer-simulated analysis and redesign of a motorcycle horn-mounting bracket for Harley-Davidson Motor Company, Milwaukee, Wisconsin.

**University of Wisconsin
Superior, Wisconsin
Fall 1982 through Spring 1985**

- ❖ Pre-requisites to engineering degree
- ❖ Computer programming

Professional Licenses

**Professional Engineer
State of Wisconsin, License Number 28561**

Certifications

**Chartered Industrial Gas Consultant (CIGC)
Institute of Gas Technology
Chicago, Illinois**